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**VIA ECF**

Honorable Georgette Castner  
U.S. District Court for the District of New Jersey  
402 East State Street  
Trenton, NJ 08608

**Re: *Zangara v. National Board of Medical Examiners*  
(Case No. 3:22-cv-1559-GC-LGH)**

Dear Judge Castner:

We represent Defendant National Board of Medical Examiners (“NBME”) in connection with the above-captioned action. On September 14, 2022, Plaintiff Jason Zangara (“Mr. Zangara”) filed a letter brief seeking leave to file a sur-reply relating to NBME’s pending motion to dismiss and including a copy of his proposed letter brief sur-reply.

Contrary to Mr. Zangara’s assertion in support of filing a sur-reply, NBME’s reply brief did not raise new issues. Rather, it responded directly to the 61-page brief Mr. Zangara filed in opposition to NBME’s motion to dismiss.

If the Court nevertheless allows Mr. Zangara’s sur-reply, NBME respectfully requests the opportunity to file a short response, to address the first point in his sur-reply (which confuses the issues before the Court on NBME’s motion to dismiss) and the second point in his sur-reply (which makes entirely new arguments).

NBME’s proposed response to Mr. Zangara’s sur-reply is attached as an exhibit to this letter request.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Adam R. Mandelsberg  
Adam R. Mandelsberg

cc: Jason Zangara, via first class mail